

PARSONS BEHLE & LATIMER
Rew R. Goodenow, Nevada Bar ID #3722
Zachary S. Shea, Nevada Bar ID #15094
50 West Liberty Street, Suite 750
Reno, Nevada 89501
Telephone: 775.323.1601
Facsimile: 775.348.7250
RGoodenow@parsonsbehle.com
ZShea@parsonsbehle.com

CAPRIO LAW, P.A.
Courtney Caprio (*Admitted Pro Hac Vice*)
Florida Bar No. 933961
40 N.W. 3rd Street, Suite 200
Miami, FL 33128
Telephone: 786.353.5760
Email: courtney@capriolawgroup.com

AXS LAW GROUP, PLLC
Jeffrey W. Gutchess (*Admitted Pro Hac Vice*)
Florida Bar No. 702641
Andrew E. Beaulieu (*Admitted Pro Hac Vice*)
Florida Bar No. 115097
2121 NW 2nd Avenue, Suite 201
Miami, Florida 33127
Telephone: 305-297-1878
jeff@axslawgroup.com
andy@axslawgroup.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MAURICIO JASSO, individually and in his
capacity as the Court-Appointed Receiver of
JAMA INVESTMENT GROUP, INC.,
GUILLERMO SESMA, SYLVIA MARTINEZ
SALINAS, BELISARIO JASSO BALDINI,
JAVIER RAMIREZ LARES, ANTONIO
BACHALANI, RODRIGO FERNANCEZ
JUAN ROMERO, and BERNARDO
VILLACECIAS,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., KATHERINE
DARRALL and JOSE RICO,

Defendants.

Case No. 2:20-CV-00858-RFB-BNW

**STIPULATION AND ORDER FOR
EXTENSION TO REPLY TO
PLAINTIFFS' MOTION TO SEAL
EXHIBIT TO PLAINTIFF'S FOURTH
MOTION TO COMPEL WELLS
FARGO BANK, N.A. TO PRODUCE
DOCUMENTS AND ADD CUSTODIANS
[ECF NO. 71]**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs Mauricio Jasso (“Jasso”), individually and in his capacity as the court-appointed receiver of JAMA Investment Group, Inc. (“JAMA”), Guillermo Sesma (“Sesma”), Sylvia Martinez Salinas (“Salinas”), Belisario Jasso Baldini (“Baldini”), Javier Ramirez Lares (“Lares”), Antonio Bachalani (“Bachalani”), Rodrigo Fernandez (“Fernandez”), Juan Romero (“Romero”), and Bernardo Villacecias (“Villacecias”) (collectively, “Plaintiffs”), and Defendants Wells Fargo Bank, N.A. (“Wells Fargo”), Katherine Darrall (“Darrall”), and Jose Rico (“Rico”) (collectively, “Defendants” and together with Plaintiffs, the “Parties”) by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plaintiffs’ deadline to file its Reply in Support of Motion to Seal Exhibit to Plaintiffs’ Fourth Motion to Compel Wells Fargo Bank, N.A. to Produce Documents and Add Custodians [ECF No. 71] (the “Motion to Seal”) by six days, from Friday, August 20, 2021, to Wednesday, August 26, 2021 for the following reasons:

1. Plaintiffs filed the Motion to Seal on July 28, 2021 [ECF No. 71] in relation to their Fourth Motion to Compel Wells Fargo to Produce Documents and Add Custodians [ECF No. 70] (the “Motion to Compel”).

2. Defendants filed Response to the Motion [ECF No. 82] on August 13, 2021.

3. Plaintiffs’ Reply in Support of the Motion is currently due on August 20, 2021.

4. A hearing on the Motion to Seal [ECF No. 71], as well as the related Motion to Compel [ECF No. 70], is currently set for September 21, 2021 before the Honorable Magistrate Judge Brenda Weksler, as stated in the Court’s July 29, 2021 Minute Order [ECF No. 74].

5. Plaintiffs assert that there is good cause for six additional days to file its Reply to allow for input from key individuals who have been or are currently, out of the office.

6. Plaintiffs also request this brief extension to analyze and respond to Defendants’ Response to the Motion to ensure that the issues raised in the Response are addressed. This additional basis also qualifies as good cause.

7. No prejudice will result due to a 6-day extension, considering the hearing is not scheduled until September 21, 2021.

This extension request is sought in good faith and is not made for the purpose of delay.

THEREFORE, for good cause shown, the Parties respectfully request an extension for Plaintiffs to file its Reply in Support of the Motion to Seal [ECF No. 71] from August 20, 2021, to and including August 26, 2021.

DATED this 19th day of August, 2021.

CAPRIO LAW, P.A.

/s/Courtney Caprio

Courtney Caprio (*pro hac vice*)
Florida Bar No. 933961
40th NW 3rd Street, Suite 200
Miami, Florida 33128

PARSONS BEHLE & LATIMER

Rew R. Goodenow
Nevada Bar No. 3722
Zachary S. Shea,
Nevada Bar No 15039
50 West Liberty Street, Suite 750
Reno, Nevada 89501

AXS LAW GROUP, PLLC

Andrew E. Beaulieu
Florida Bar No. 115097
Jeffrey W. Gutchess
Florida Bar No. 702641
2121 NW 2nd Avenue, Suite 201
Miami, Florida 33127
Attorneys for Plaintiffs

DATED this 19th day of August, 2021.

SNELL & WILMER L.L.P.

/s/Erica J. Stutman (with permission)

Jeffrey Willis
Nevada Bar No. 4797
Erica J. Stutman
Nevada Bar No. 10794
3883 Howard Hughes Parkway, Suite
1100
Las Vegas, Nevada 89169

*Attorneys for Wells Fargo Bank, N.A.,
Katherine Darrall, and Jose Rico*

IT IS SO ORDERED.

DATED: August 20, 2021.



UNITED STATES MAGISTRATE JUDGE